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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

AUG 11 1988

Mr. Evon Midei
Vice President for Administrative Services
Allentown Osteopathic Medical Center
1736 Hamilton St.
Allentown, PA 18104

Re: Novak Sanitary Landfill Site
Lehigh County, Pennsylvania

Dear Mr. Midei:

This letter is written as a response to your letter of October 16, 1987 to Mr. Bruce Smith of the Environment Protection Agency (EPA) regarding the Allentown Osteopathic Medical Center's (AOMC) use of the Novak Sanitary Landfill. Your response indicated that AOMC contracted with Valley Disposal in 1978 for the removal of rubbish. Your response also indicated the AOMC contracted with American Environmental Services to remove hazardous materials including xylene, and included purchase orders dated in 1982. EPA requests information concerning the initial date of contract with both American Environmental Services and Valley Disposal and the disposal of hazardous substances like xylene prior to contract with American Environmental Services.

As you know, the EPA is seeking information concerning the release, or the threat of a release, of hazardous substances into the environment from the Novak Sanitary Landfill Site. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), public law 99-499, 100 Stat. 1613, your company is again requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14) which were transported to, or stored, or disposed of at the Novak Sanitary Landfill Site in South Whitehall Township, Lehigh County, Pennsylvania.

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EPA currently has information indicating that the owner of the Novak Sanitary Landfill also operated a waste hauling business under the name of Valley Disposal, Inc. or Valley Recycling. Records maintained at the landfill office indicate that wastes hauled by these companies were disposed at the Novak Sanitary Landfill. Your company's name is listed as a customer of Valley Disposal or Valley Recycling.

EPA has determined that your response to its previous information request letter was inadequate or incomplete. EPA now requests that you further respond to this information request within fifteen (15) days of your receipt of this letter and supply all information and documentation concerning:

1. the date your company first contracted with American Environmental Services;
2. policies and procedures followed by your company to prevent mixing of potentially hazardous and non-hazardous waste streams prior to the date identified in response to question 1;
3. methods of disposal of potentially hazardous substances prior to the first date of contract with American Environmental Services; and
4. the volume of waste and waste containing potentially hazardous substances sent to Novak Landfill.

If documentation supporting any statements supplied by the respondent to this letter can not be supplied to EPA, then EPA requests that the source of information; including employee interview, employee recollection, employee name, employee position, etc.; be identified in your response to this letter.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Please send the required information to:

Michael Towle, Remedial Enforcement Officer
U.S. Environmental Protection Agency
PA. CERCLA Remedial Enforcement Section (3H/12)
841 Chestnut Street, 6th Floor
Philadelphia, Pennsylvania 19107

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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If you have any questions concerning this matter, please contact Michael Towle at (215) 597-3166.

Sincerely,

Gregg Crystall, Chief
PA CERCLA Remedial Enforcement Section

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Enclosures

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ADMC

CONCURRENCES

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SURNAME	3HW12	3HW12						
DATE	08/10/88							

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Vice Pres. for Adm. Serv.

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9. State and ZIP Code

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AUG 11 1988

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- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



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U.S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section

841 Chestnut Building, 6th Floor

Philadelphia, PA 19107